



Anti-Corruption and Bribery Policy

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training on it and are advised and offered updated training as and when the Policy is updated. They are also responsible for ensuring that University employees understand the potential consequences of an act of bribery or corruption. Managers must act as

6. WHAT YOU MUST NOT DO

- 6.1. It is not acceptable for you (or someone on your behalf) to:
- (a) give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
 - (b) give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome;
 - (c) accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that it we will provide a business advantage for them or anyone else in return;
 - (d) accept hospitality from a third party that is unduly lavish or extravagant under the circumstances;
 - (e) offer or accept a gift to or from government officials or representatives, or politicians or political parties, without the prior approval of the CFO;
 - (f) threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this Policy;
 - (g) offer or accept a payment, gift or hospitality to or from an international supplier or agent that you know or suspect is offered with the expectation that we will provide a business advantage in return;
 - (h) engage in any of the practices forbidden under this Policy when working abroad on behalf of the University or when interacting with international contacts of the



8.5. Reimbursing a third party's expenses, or accepting an offer to reimburse the expenses (for example, the costs of attending a business meeting) would not usually amount to bribery. However, a payment in excess of genuine and reasonable business expenses (such as the cost of an extended hotel stay) is not acceptable.

8.6 Gifts or hospitality should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, or from anyone working in the public sector (including, for example, educational institutions and their subsidiary companies), without the prior approval of the CFO.

8.7 The University appreciates that practice varies between countries and regions and what may be normal and acceptable in one region may not be in another. As before, bear in mind when travelling abroad that what is local and is not necessarily compliant with applicable local laws and therefore, in assessing the situation caution should always be exercised. Consider in all the circumstances whether the gift, hospitality or payment is reasonable

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10.3. You must submit all expenses claims relating to hospitality,

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13. PROTECTION

- 13.1. Individuals who refuse to accept or offer a bribe, or who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The University aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.
- 13.2. The University is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the CFO immediately. If the matter is not remedied, and you are an employee, you should raise it formally in accordance with our Grievance Policy which can be found on the intranet.
- 13.3. No person must threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

14. TRAINING AND COMMUNICATION

- 14.1. An anti-corruption and bribery training programme will be incorporated into the 8 Q L Y @ L W \ ¶ V compliance training programme. This will be supported by both regular communications and a periodic refresh appropriate

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15.3. All accounts, F1 9.96 Tf1 0 0 1 125.42 743.86 Tm0 g0 G[)JTJETQ0.00000888 G[)JTJETEMC /Span #MCID C

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- (g) student places; and
- (h) examination results and associated processes.

17.3. The following is a list of possible _____ that may arise during the course of you working for ~~us~~ and which may raise concerns under various

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- (k) you receive an invoice from a third party that appears to be non-standard or customised;
- (l) a third party insists on the use of side letters or refuses to put terms agreed in writing;
- (m) you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- (n) a third party requests or requires